

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
SOUTHERN DIVISION**

Crystal Long	*	
	*	
Plaintiff,	*	Case No.: 8:17-cv-01955-GJH
	*	
v.	*	
	*	
Pendrick Capital Partners II, LLC, et al.	*	
	*	
Defendants.	*	
	*	

**PLAINTIFF’S NOTICE OF SUPPLEMENTAL AUTHORITY**

As supplemental authority in support of her Cross-Motion for Partial Summary Judgment, Plaintiff respectfully submits the attached Memorandum Opinion issued on February 22, 2019 by the Court of Appeals for the Third Circuit in *Barbato v. Greystone Alliance LLC, et al.*, No. 18-1042, 2019 U.S. App. LEXIS 5336 (3d Cir. Feb. 22, 2019). In that case, a buyer of charged-off consumer debt challenged its characterization as a debt collector under the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. 1692a(6) based on its use of a third party servicer or law firm to collect on its behalf. *Id.* at 3.

The Court considered whether the debt buyer, Crown Asset Management, fell within the first prong of the FDCPA definition for debt collector as a business “any business the principal purpose of which is the collection of any debts.” 15 U.S.C. § 1692a(6). The Third Circuit found that “[a]lthough Crown does not contact consumers directly, it principally derives revenue from liquidating the consumer debt it has acquired.” *Barbato*, 2019 U.S. App. LEXIS 5336, at 3. Accordingly, the Court concluded that “an entity that otherwise meets the “principal purpose”

definition cannot avoid the dictates of the FDCPA merely by hiring a third party to do its collecting.” *Id.* at \*3.

Dated: Washington, DC  
March 8, 2019

Respectfully submitted,

/s/ Courtney L. Weiner  
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**CERTIFICATE OF SERVICE**

I certify that on March 8, 2019, a copy of the foregoing Notice of Supplemental Authority was served via ECF and U.S. Mail to all counsel of record.

/s/ Courtney L. Weiner